

KILPATRICK TOWNSEND & STOCKTON LLP
DAVID K. CAPLAN (State Bar No. 181174)
dcaplan@kilpatricktownsend.com
1801 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: 310-248-3830
Facsimile: 310.860.0363

Attorneys for Petitioner
Light & Wonder, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: DMCA SECTION 512(h)
SUBPOENA TO CLOUDFLARE, INC.

Case No.:

**LIGHT & WONDER, INC.'S REQUEST
TO THE CLERK FOR ISSUANCE OF A
SUBPOENA PURSUANT TO 17 U.S.C.
§ 512(h) TO IDENTIFY ALLEGED
INFRINGEMENTS**

Petitioner Light & Wonder, Inc. ("Light & Wonder"), by and through its undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena directed to Cloudflare, Inc. ("Cloudflare") to identify an alleged infringer or infringers, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (the "Subpoena"). A copy of the proposed Subpoena is attached hereto as Exhibit 2 to the Declaration of David K. Caplan ("Caplan Decl.").

The requested subpoena relates to infringing material that Light & Wonder discovered on the websites <<https://www.triple-pg.com>> and <<https://weblobby.triple-pg.com/game/HTML5/SlotGame16/73/dUY0VEFQYm80cFdkVU1qM1p3TIRHThk3U1ViUXJyMnFjMVfhc0xESjFlMmk4TW82VG9KbkE3TDdXamdWMHJiSG1jdmZwaS9ubW1NSVV0M24rZWljbHBDc2NXR3lxcE1CUVdJWVZ4VmRMd2RucUo3VUo2S1M2ckdqQTK2YUV1cnF5U>>



VNqNDkxblNLSjRpcnEwd3Jqb11BPT0?sfx=1&bgm=1&lang=1&fps=0&mode=2>, for which Light & Wonder is informed and believes Cloudflare is the Internet Service Provider. The infringing material includes, without limitation, unauthorized copies of copyrighted images and content from the 88 Fortunes® family of games (“88 Fortunes”), of which Light & Wonder is the exclusive owner of all copyright, trademark, and other intellectual property rights.

Light & Wonder has satisfied the requirements for issuance of a subpoena pursuant to 17 U.S.C. § 512(h), namely:

- (1) Light & Wonder has submitted a copy of the notification required by 17 U.S.C. § 512(c)(3)(A). *See* Caplan Decl. ¶ 3, Ex. 1.
- (2) Light & Wonder has submitted the proposed Subpoena concurrently herewith. *See* Caplan Decl. ¶ 5, Ex. 2.
- (3) Light & Wonder has submitted a sworn declaration confirming that the purpose for which the Subpoena is sought is to obtain the identity of the alleged infringer or infringers, and that such information will only be used for the purpose of protecting rights under Title 17 U.S.C. § 512(h)(2). *See* Caplan Decl. ¶ 4.

Because Light & Wonder has complied with the statutory requirements, Light & Wonder respectfully requests that the Clerk expeditiously issue and sign the proposed Subpoena pursuant to 17 U.S.C. § 512(h)(4) and return it to the undersigned counsel for service on the subpoena recipient.

DATED: May 25, 2023

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

By:


DAVID K. CAPLAN

Attorneys for Petitioner Light & Wonder, Inc.



KILPATRICK TOWNSEND & STOCKTON LLP
DAVID K. CAPLAN (State Bar No. 181174)
dcaplan@kilpatricktownsend.com
1801 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: 310-248-3830
Facsimile: 310.860.0363

Attorneys for Petitioner
Light & Wonder, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: DMCA SECTION 512(h)
SUBPOENA TO CLOUDFLARE, INC.

Case No.:

**DECLARATION OF DAVID K. CAPLAN
IN SUPPORT OF LIGHT & WONDER,
INC.'S REQUEST TO THE CLERK FOR
ISSUANCE OF A SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h) TO
IDENTIFY ALLEGED INFRINGERS**

DECLARATION OF DAVID K. CAPLAN

I, David K. Caplan, declare as follows:

1. I am a partner with the law firm of Kilpatrick Townsend & Stockton LLP, counsel of record for Petitioner Light & Wonder, Inc. ("Light & Wonder"). I have personal knowledge of the facts contained herein and, if called upon to do so, could and would testify competently thereto.

2. I submit this declaration in support of Light & Wonder's request for issuance to Cloudflare, Inc. ("Cloudflare"), the Internet Service Provider for the websites <<https://www.triple-pg.com>> and <<https://weblobby.triple-pg.com>>

DECL. OF DAVID K. CAPLAN ISO LIGHT & WONDER'S
REQUEST FOR ISSUANCE OF A DMCA SECTION 512(H)
SUBPOENA TO CLOUDFLARE, INC.

KILPATRICK TOWNSEND & STOCKTON LLP
9720 WILSHIRE BLVD, PH
BEVERLY HILLS, CA 90212
310-248-3830



pg.com/game/HTML5/SlotGame16/73/dUY0VEFQYm80cFdkVU1qM1p3TIRHThk3U1ViUXJy
MnFjMVfhc0xESjFlMmk4TW82VG9KbkE3TDdXamdWMHJiSG1jdmZwaS9ubW1NSVV0M2
4rZWljbHBDc2NXR3lxcE1CUVdJWVZ4VmRMd2RucUo3VUo2S1M2ckdqQTk2YUV1cnF5U
VNqNDkxblNLSjRpcnEwd3Jqb1lBPT0?sfx=1&bgm=1&lang=1&fps=0&mode=2>, of a
subpoena pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512 (h) (the
“Subpoena”), to identify one or more alleged infringers whom Light & Wonder is informed and
believes posted copyrighted images and content from the 88 Fortunes® family of games (the
“Infringing Content”) on systems operated by Cloudflare without Light & Wonder’s authorization.


3. On November 30, 2022 and May 9, 2023, Light & Wonder submitted notifications
via email identifying the Infringing Content on Cloudflare’s systems and providing the
information required by 17 U.S.C. § 512(c)(3)(A). Attached hereto as **Exhibit 1** are true and
correct copies of the notifications sent to Cloudflare.

4. The purpose for which the Subpoena to Cloudflare is sought is to obtain the identity
of the alleged infringer (or infringers) and such information will only be used for the purpose of
protecting rights under title 17 U.S.C. §§ 100, *et seq.*

5. A true and correct copy of Light & Wonder’s proposed Subpoena to Cloudflare is
attached hereto as **Exhibit 2**.

I declare under penalty of perjury under the laws of the State of California and United
States of America that the foregoing is true and correct.

Executed on May 25, 2023, at Los Angeles, California.



David K. Caplan



EXHIBIT 1

Kautz, Rose

From: Caplan, David
Sent: Thursday, April 27, 2023 10:24 AM
To: Kautz, Rose
Subject: FW: [9f9bb0b508e15a6c]: Cloudflare has responded to your DMCA copyright infringement complaint

Follow Up Flag: Follow up
Flag Status: Completed

David Caplan
Kilpatrick Townsend & Stockton LLP
1801 Century Park East | Suite 2300 | Los Angeles, CA 90067 office 310 777 3722 | cell 323 828 5970 | fax 310 388 5312
dcaplan@kilpatricktownsend.com | www.kilpatricktownsend.com

-----Original Message-----

From: Cloudflare <abuse@notify.cloudflare.com>
Sent: Wednesday, November 30, 2022 2:56 PM
To: Caplan, David <DCaplan@kilpatricktownsend.com>
Subject: [9f9bb0b508e15a6c]: Cloudflare has responded to your DMCA copyright infringement complaint

****CAUTION: External Email****

Cloudflare received your DMCA copyright infringement complaint regarding: triple-pg.com

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare cannot remove material from the Internet that is hosted by others.

Accepted URL(s) on weblobby.triple-pg.com:

<https://weblobby.triple-pg.com/game/HTML5/SlotGame16/73/dUY0VEFQYm80cFdkVU1qM1p3TIRHThk3U1ViUXJyMnFjMVfHc0xEsJFIMmk4TW82VG9KbkE3TDdXamdWmHJiSG1jdmZwaS9ubW1NSVV0M24rZWljbHBDc2NXR3lxcE1CUVdJWVZ4VmRMd2RucUo3VUo2S1M2ckdqQtK2YUV1cnF5UVNqNDkxblNLSjRpcnEwd3Jqb1lBPT0?sfx=1&bgm=1&lang=1&fps=0&mode=2>

Hosting Provider:

Google LLC
Abuse Contact: google-cloud-compliance@google.com

We have notified our customer of your report.
We have forwarded your report on to the responsible hosting provider.

You may also direct your report to:

1. The provider where triple-pg.com is hosted (provided above); 2. The owner listed in the WHOIS record for triple-pg.com and/or; 3. The contact listed on the triple-pg.com site.

Note: A lookup of the IP for a Cloudflare customer website will show Cloudflare IPs because we are a pass-through network. The actual website is still hosted at the hosting provider indicated above. If the hosting provider has any questions, please have the hosting provider contact us directly regarding this site. Due to attempted abuse of our complaint reporting process, we will only provide the IP of triple-pg.com to the responsible hosting provider if they contact us directly at abusereply@cloudflare.com.

Regards,
Cloudflare Trust & Safety

Submit an Abuse Report

Copyright Infringement & DMCA Violations

Your full name

Rose Kalutz

© holder's full name

Light & Wonder, Inc.

Your email address

rkautz@kilpatricktownsend.com

Confirm email address

rkautz@kilpatricktownsend.com

Title (optional)

Outside IP Counsel for Light & Wonder, Inc.

Company name (optional)

Kilpatrick Townsend & Stockton LLP

Telephone (optional)

3103107004

Address

1801 Century Park East Suite 2300 Los Angeles, CA 90067

City

Los Angeles

State / province

CA

Country

United States

Infringing URLs

https://web/lobby/triplepg.com/game/HTML5/SlotGame16/73/d/U0V0FEQYm80cfDkVU1qM1p3TIRHTk3U1ViUXJyMnfjMVPhc0xESjFI Mmk4T1W82VG9KbkE3TDdXamdWMHjSG1jdmZwa59ubW1NSVWOM24rZWjph8DC2NXR3kc1CUVdWVZ4VmRMd2RucUo3VUo251MzckdgQTKzYU1cnf5UVNqN0KxbiNLSjRprcEdwd3Jqb1BPT0?sfw=1&bgm=1&lang=1&fps=0&mode=2

Information to include in copyright complaints

Because Cloudflare shares copyright infringement complaints with the relevant hosting providers and website operators, we only process reports that include all information required by section 512(d) of the DMCA. To ensure that your copyright infringement abuse report is processed, you must include all information listed as required in the form. You may submit up to 250 URLs at a time. For more information about the information to include in your report, go [here](#). An explanation of our approach to abuse and what you can expect us to do in response to your report is available [here](#). Please note that reports submitted through this form are subject to Cloudflare's privacy policy, and that reports may be released by Cloudflare to third parties such as the Lumina Database.

Describe the original work

We are outside counsel to Light & Wonder, Inc. (collectively, with its subsidiaries "L&W"). L&W is owner of copyright, trademark, and other intellectual property rights in the 88 Fortunes® family of games ("88 Fortunes").

L&W is the sole and exclusive owner of all rights in the unique art assets, characters, scenes, graphical displays, and other protected elements of the 88 Fortunes games. Per 17 U.S. Code § 102, Copyright protection subsists, in "original works of authorship fixed in any tangible medium of expression, now known or later developed, from which they can be perceived, reproduced, or otherwise communicated, either directly or with the aid of a machine or device." Although not required by copyright law, L&W has obtained 18 federal copyright registrations related to the 88 Fortunes games. Representative images of these copyrighted works can be seen at <https://gaming.lnw.com/Games/vms/diva-lu-digital-game-series-and> <https://gaming.lnw.com/Games/Scientific-Games/class3/premium-games/88-Fortunes-7927>.

L&W also owns trade dress rights in the distinctive look and feel of 88 Fortunes, and trademark rights relating to 88 Fortunes worldwide, including U.S. registered trademark Nos. 4846359, 5623785, 5623931, and 5754383.

The Infringing Domain is being used to offer a near-duplicate of 88 Fortunes, that appears to be designed to mislead customers into believing it is an official 88 Fortunes game, is associated or affiliated with, or is licensed or sponsored by L&W. The game is substantially and strikingly similar to 88 Fortunes, due to extensive copying of L&W's copyrighted images and overall look and feel of L&W's game.

We request that Cloudflare disable the Infringing Domain. If Cloudflare merely acts as a pass-through, we request you identify the host so we can work with the host directly to stop the infringement.

512(f) acknowledgment, Good faith belief, Authority to act

By checking this box, you attest, under penalty of perjury, that you have a good faith belief that use of the material in this report is not authorized by the copyright owner, its agent, or the law, AND you are authorized to act on behalf of the copyright owner, AND you understand, under 17 U.S.C. § 512(f), you may be liable for any damages, including costs and attorneys' fees, if you knowingly materially misrepresent reported material.

☒ I understand and agree

Digital signature

Rose Kalutz

By entering your name, you affirm all information is true and accurate while agreeing to the policies on this page.

Because Cloudflare does not have the ability to remove content from a website, it is our practice to forward abuse complaints to entities like the hosting provider and/or website owner to followup. Please specify:

Who should be notified?

Please select at least one.

Note: The hosting provider may have their own policies for how they notify the website owner of a complaint.

☒ Please forward my report to the website hosting provider.

☐ Include my name and contact information with the report to the website hosting provider.

☒ Please forward my report to the website owner.

☐ Include my name and contact information with the report to the website owner.

Submit

© 2023 Cloudflare, Inc. | [Privacy Policy](#) | [Terms of Use](#) | [Disclosure](#) | [Trademark](#)

Kautz, Rose

From: Cloudflare <noreply@notify.cloudflare.com>
Sent: Tuesday, May 9, 2023 8:13 PM
To: Kautz, Rose
Subject: [c59a6d52aa170eca] Cloudflare: Abuse report confirmation

****CAUTION: External Email****

This email is to confirm that your abuse report to Cloudflare has been received and will be processed shortly.

This may be the only response you receive regarding your report. Due to the large volume of reports we receive, it is not possible for us to send a personal response to every report.

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and domain registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare is not generally a website hosting provider, and we cannot remove material from the Internet that is hosted by others.

Regards,
Cloudflare Trust & Safety

Kautz, Rose

From: Cloudflare <abuse@notify.cloudflare.com>
Sent: Tuesday, May 9, 2023 8:13 PM
To: Kautz, Rose
Subject: [c59a6d52aa170eca]: Cloudflare has responded to your DMCA copyright infringement complaint

****CAUTION: External Email****

Cloudflare received your DMCA copyright infringement complaint regarding: triple-pg.com

Cloudflare offers network service solutions including pass-through security services, a content distribution network (CDN) and registrar services. Due to the pass-through nature of our services, our IP addresses appear in WHOIS and DNS records for websites using Cloudflare. Cloudflare cannot remove material from the Internet that is hosted by others.

Accepted URL(s) on weblobby.triple-pg.com:

<https://weblobby.triple-pg.com/game/HTML5/SlotGame16/73/dUY0VEFQYm80cFdkVU1qM1p3TIRHThk3U1ViUXJyMnFjMVFhc0xEsJFIMmk4TW82VG9KbkE3TDdXamdWMHJiSG1jdmZwaS9ubW1NSVV0M24rZWljbHBDc2NXR3lxcE1CUVdJWVZ4VmRMd2RucUo3VUo2S1M2ckdqQtK2YUV1cnF5UVNqNDkxblNLSjRpcnEwd3Jqb1lBPT0?sfx=1&bgm=1&lang=1&fps=0&mode=2>

Hosting Provider:

GOOGLE-CLOUD-PLATFORM

Abuse Contact:

google-cloud-compliance@google.com

We have notified our customer of your report.
We have forwarded your report on to the responsible hosting provider.

You may also direct your report to:

1. The provider where triple-pg.com is hosted (provided above); 2. The owner listed in the WHOIS record for triple-pg.com and/or; 3. The contact listed on the triple-pg.com site.

Note: A lookup of the IP for a Cloudflare customer website will show Cloudflare IPs because we are a pass-through network. The actual website is still hosted at the hosting provider indicated above. If the hosting provider has any questions, please have the hosting provider contact us directly regarding this site. Due to attempted abuse of our complaint reporting process, we will only provide the IP of triple-pg.com to the responsible hosting provider if they contact us directly at abusereply@cloudflare.com.

Regards,
Cloudflare Trust & Safety

EXHIBIT 2

UNITED STATES DISTRICT COURT

for the

Northern District of California

In re: DMCA Subpoena to Cloudflare, Inc.

Plaintiff

v.

Defendant

Civil Action No.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Cloudflare, Inc., ATTN: Legal Department, 101 Townsend St, San Francisco, CA 94107

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment A

Place: KILPATRICK TOWNSEND & STOCKTON LLP
1801 Century Park East, Suite 2300
Los Angeles, CA 90067

Date and Time:

05/31/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk_____
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) _____, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* _____
 on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

 _____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
 _____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Print

Save As...

Add Attachment

Reset

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

ATTACHMENT A

1. All information, including documents and electronic files, sufficient to identify the name(s), address(es), telephone number(s), e-mail address(es), and IP address(es) of the individual(s) who registered the domain: <https://www.triple-pg.com>.

2. All information, including documents and electronic files, sufficient to identify the name(s), address(es), telephone number(s), e-mail address(es), and IP address(es) of the individual(s) who operates the website located at the domain: <https://www.triple-pg.com>.

3. All information, including documents and electronic files, sufficient to identify the name(s), address(es), telephone number(s), e-mail address(es), and IP address(es) of the individual(s) who posted the infringing content “888 Fortunes” at the following link: <https://weblobby.triple-pg.com/game/HTML5/SlotGame16/73/dUY0VEFQYm80cFdkVU1qM1p3TIRHThk3U1ViUXJyMnFjMVfhc0xESjFlMmk4TW82VG9KbkE3TDdXamdwmHJiSG1jdmZwaS9ubW1NSVV0M24rZWljbHBDc2NXR3lxcE1CUVdJWVZ4VmRMd2RucUo3VUo2S1M2ckdqQTk2YUV1cnF5UVNqNDkxblNLSjRpcnEwd3Jqb1lBPT0?sfx=1&bgm=1&lang=1&fps=0&mode=2>